

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :
 :
- v. - :
 :
ALLEN HUNTER, :
a/k/a "Ricardo Tucker," :
a/k/a "Kenneth Lewis," and :
MATTHEW WALDRON, :
 :
Defendants. :
----- x

15 CRIM 236

INDICTMENT

15 Cr.

JUDGE SCHEINDLIN
USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/16/15

COUNT ONE

The Grand Jury charges:

1. From at least in or about November 2014, up to and including in or about January 2015, in the Southern District of New York and elsewhere, ALLEN HUNTER, a/k/a "Ricardo Tucker," a/k/a "Kenneth Lewis," and MATTHEW WALDRON, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, HUNTER, WALDRON, and others agreed to

commit robberies of establishments engaged in interstate commerce.

(18 U.S.C. § 1951.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, ALLEN HUNTER, a/k/a "Ricardo Tucker," a/k/a "Kenneth Lewis," and MATTHEW WALDRON, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense.

Substitute Asset Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - c. has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be subdivided without difficulty;
- it is the intent of the United States, pursuant to 18 U.S.C. § 982(b)

and 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981,
Title 28, United States Code, Section 2461, and
Title 18, United States Code, Section 1951.)



FOREPERSON



PREET BHARARA HF
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INDICTMENT


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(18 U.S.C. §§ 1951, 2.)

PREET BHARARA
United States Attorney.

A TRUE BILL

Foreperson,



4/16/15 Filed Indictment
Judge Detbarn
